

1 ADAM GANZ, ESQ.  
Nevada Bar No. 6650  
2 [Aganz@ganzhauf.com](mailto:Aganz@ganzhauf.com)  
MARJORIE L. HAUF, ESQ.  
3 Nevada Bar No. 8111  
[Mhauf@ganzhauf.com](mailto:Mhauf@ganzhauf.com)  
4 MELANIE L. THOMAS, ESQ.  
Nevada Bar No. 12576  
5 [Mthomas@ganzhauf.com](mailto:Mthomas@ganzhauf.com)  
GANZ & HAUF  
6 8950 W. Tropicana Ave., Suite 1  
Las Vegas, Nevada 89147  
7 Tel: (702) 598-4529  
Fax: (702) 598-3626  
8 *Attorneys for Plaintiffs*

9 -00o-

10 **DISTRICT COURT**

11 **CLARK COUNTY, NEVADA**

12 SUSAN HOY as Special Administrator of the  
ESTATE OF A.D.J., a male minor (November 17,  
13 2003 - April 25, 2017), and SUSAN HOY as  
Guardian Ad Litem of A.B.J., a female minor,  
14 (December 21, 2005), DIJONAY THOMAS,  
individually and as heir to A.D.J.,

15 Plaintiffs,  
16 v.

17 PAUL D. JONES, individually; CAROLE  
FALCONE, individually and in her official  
18 capacity; PAULA HAMMACK, individually and  
in her official capacity; CLARK COUNTY  
19 DEPARTMENT OF FAMILY SERVICES;  
COUNTY OF CLARK, a political subdivision of  
the State of Nevada; DOES I-X, individuals; and  
20 ROE CORPORATIONS I-X; DOE CLARK  
COUNTY DEPARTMENT OF FAMILY  
21 SERVICES EMPLOYEES XI-XXX; individually  
and in their official capacities,

22 Defendants.

CASE NO: 2:18-cv-01403-RFB-GWF

**STIPULATION AND  
[PROPOSED] ORDER  
DISMISSING ALL CLAIMS AGAINST  
DEFENDANT CLARK COUNTY  
DEPARTMENT OF FAMILY SERVICES  
(ONLY) WITH PREJUDICE AND TO  
ALLOW PLAINTIFFS TO FILE AN  
AMENDED COMPLAINT**

24 Plaintiffs SUSAN HOY as Special Administrator of the ESTATE OF A.D.J., and SUSAN  
25 HOY as Guardian Ad Litem of A.B.J., and DIJONAY THOMAS, by and through their counsel of  
record, MARJORIE HAUF, ESQ. and MELANIE L. THOMAS, ESQ., of the law firm of GANZ &  
26 HAUF and Defendant CLARK COUNTY DEPARTMENT OF FAMILY SERVICES, by and through  
its counsel of record, FELICIA GALATI, ESQ. of the law firm of OLSON, CANNON, GORMLEY,  
27 ANGULO & STOBERSKI, hereby stipulate to dismiss all claims against Defendant CLARK  
28

COUNTY DEPARTMENT OF FAMILY SERVICES (only), in the above-entitled matter, with prejudice, with each party to bear their own fees and costs incurred herein.<sup>1</sup>

The parties further stipulate to allow Plaintiffs to amend their Complaint to add additional Defendants related to the weekly rental complex where the Decedent was killed.

DATED this 14<sup>th</sup> day of November, 2018.  
GANZ & HAUF

DATED this 14<sup>th</sup> day of November, 2018.  
OLSON, CANNON, GORMLEY, ANGULO  
& STOBERSKI

*/s/ Marjorie Hauf, Esq.*

/s/ *Felicia Galati, Esq.*

MARJORIE HAUF, ESQ.  
Nevada Bar No. 8111  
MELANIE L. THOMAS, ESQ.  
Nevada Bar No. 12576  
8950 W. Tropicana Ave., Ste. 1  
Las Vegas, Nevada 89147  
*Attorneys for Plaintiffs*

FELICIA GALATI, ESQ.  
Nevada Bar No. 7341  
9950 W. Cheyenne Ave.  
Las Vegas, Nevada 89129  
*Attorneys for Defendants*

IT IS SO ORDERED.

DATED this 26th day of November, 2018.

  
RICHARD F. BOULWARE, II  
United States District Judge

<sup>1</sup> The claims against Defendants PAUL D. JONES, individually; CAROLE FALCONE, individually and in her official capacity; PAULA HAMMACK, individually and in her official capacity; COUNTY OF CLARK, a political subdivision of the State of Nevada; DOES I-X, individuals; and ROE CORPORATIONS I-X; DOE CLARK COUNTY DEPARTMENT OF FAMILY SERVICES EMPLOYEES XI-XXX; individually and in their official capacities, will remain and are not subject to this Stipulation.